

EXHIBIT 1

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF PRINCE WILLIAM

WILLIE JACKSON

PLAINTIFF,

v.

CASE NO. _____

JASON EDWARD BURNETT
“In his individual capacity”
14812 Links Pond Circle
Gainesville, VA 20155
(Prince William County)

and

UNITED STATES CAPITOL POLICE
c/o Office of the General Counsel
119 D Street, NE
Washington, DC 20510

Serve: The Honorable Secretary Kelly Gee
Office of the Secretary of the Commonwealth
1111 Broad Street, 4th Floor
Richmond, VA 23219
(City of Richmond)

DEFENDANTS.

COMPLAINT

COMES NOW the Plaintiff, Willie Jackson, and respectfully moves for judgment against Defendants, Jason Edward Burnett, and the United States Capitol Police (“USCP”), on the grounds and in the amount set forth below:

1. On or about March 30, 2022, the Plaintiff was operating a motor vehicle in an easterly direction on Interstate 66 at or near mile marker 47.6 in Prince William County, Virginia.
2. At that time and place, Defendant Burnett was operating a motor vehicle in an easterly direction on Interstate 66 at or near mile marker 47.6.

3. At that time and place, Interstate 66 was a four-lane divided highway running east and west with a barrier wall separating the eastbound lanes and westbound lanes and a Jersey wall on the right side of the highway.
4. At that time and place, traffic traveling east on Interstate 66 was relatively light due to the early morning hour.
5. At that time and place, Defendant Burnett suddenly and without warning negligently struck the rear of Plaintiff's vehicle from behind, forcing Plaintiff's vehicle to slide uncontrollably left and then back across the highway approximately 80 feet nearly head-on into the Jersey wall on the right side of the highway.
6. At that time and place, Defendant Burnett owed various duties of care, including but not limited to, a duty to use ordinary care to keep a proper lookout, a duty to keep the vehicle under proper control, and a duty to operate his vehicle at a reasonable speed under the existing conditions and a duty to otherwise use reasonable care in driving, giving due regard to all surrounding circumstances, vehicles, and traffic lanes.
7. Defendant Burnett breached each of the duties owed Plaintiff.
8. The above-described collision was caused by carelessness, recklessness, and negligence in the operation of the vehicle by Defendant Burnett.
9. At all times relevant, Defendant Burnett was a servant, agent, or employee of Defendant USCP, acting in the course and scope of his agency or employment.
10. Defendant USCP is vicariously liable to Plaintiff for the negligence of Defendant Burnett under the doctrine of respondeat superior.
11. Notwithstanding said duties, Defendant Burnett recklessly, carelessly, and negligently operated his vehicle so that it collided with the Plaintiff's vehicle with great force and

violence.

12. Defendant Burnett was negligent in that he:

- a. failed to keep a proper lookout;
- b. exceeded a reasonable speed under the circumstances and conditions;
- c. failed to give full time and attention to the operation of his vehicle; and
- d. failed to keep his vehicle under proper control.

13. As a direct and proximate result of the above-described collision hereinabove, Plaintiff was caused to suffer serious and permanent injuries, has suffered, and will continue to suffer pain of body and mind; has incurred medical and related expenses in an effort to be cured of said injuries; and has been deprived of earnings.

WHEREFORE, Plaintiff demands judgment against Defendants Burnett and USCP, jointly and severally, in the sum of Two Hundred Thousand Dollars (\$200,000.00), in compensatory damages and his costs expended in this action and prejudgment interest.

A trial by jury is demanded.

WILLIE JACKSON

BY:

COUNSEL

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